

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ENZOLYTICS, INC., <div style="text-align: center;">Plaintiff,</div> <div style="text-align: center;">v.</div> CIMARRON CAPITAL, LTD. <div style="text-align: center;">Defendant.</div>	: : : : : : : : : :	C.A. NO. 1:21-CV-01599-RGA
ENZOLYTICS, INC., <div style="text-align: center;">Plaintiff,</div> <div style="text-align: center;">v.</div> KONA CONCEPTS, INC. <div style="text-align: center;">Defendant.</div>	: : : : : : : : : :	C.A. NO. 1:21-CV-01600-RGA

**OPPOSITION OF ENZOLYTICS, INC. TO
DEFENDANTS' MOTION FOR EXTENSION OF TIME**

Plaintiff, Enzolytics, Inc., submits this opposition to Defendants' motion for an extension of time to retain Delaware counsel.

1. As noted by Defendants in their motion, on November 8, 2023, Defendants, Cimarron Capital, Ltd. and Kona Concepts, Inc., were ordered to retain new Delaware counsel on or before December 8, 2023.

2. That order arose out of the withdrawal of Defendants' prior Delaware counsel, whose motion to withdraw was filed on October 10, 2023. (Dkt. 74).

3. At the November 8, 2023 hearing, undersigned counsel for Enzolytics, Inc. expressed the need for this case to progress without further delay. In response to that concern, the Court advised the parties that if Defendants did not engage Delaware counsel by December 8, 2023 (within 30 days of the hearing) that Enzolytics, Inc. would be permitted to file for default judgment.

4. As of the date of this filing, Defendants have *still* not engaged Delaware counsel, despite over two months having elapsed since their prior Delaware counsel's filing of its motion to withdraw.

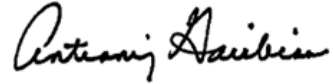
5. Defendants now seek an extension of the deadline set by the Court, which has passed, but their motion offers no explanation for the delay, only stating the obvious fact that they have not been able to retain Delaware counsel.

6. Defendants are seeking relief from a Court order – but offer no reason or basis for the Court to extend the deadline, which was expressly set in order to ensure that this case is not delayed any more than it already has been.

7. At this point, the Court's deadline has expired and Plaintiff wishes to move forward with a motion for default judgment.

WHEREFORE, Enzolytics, Inc. respectfully requests that the Court deny Defendants' motion for an extension of time to retain Delaware counsel.

Respectfully Submitted,

A handwritten signature in black ink, reading "Antranig Garibian". The signature is fluid and cursive, with the first name "Antranig" and last name "Garibian" clearly distinguishable.

By: Antranig Garibian, Esq. (DE Bar No. 4962)
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